

EXHIBIT 7

From: Lindsay Cooper <lindsaycooper@quinnemanuel.com>
Sent: Wednesday, April 13, 2022 6:33 AM
To: Dan Smith; Marc Kaplan; Jae Pak
Cc: Sonos-NDCA06754-service; QE-Sonos3
Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

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Dan,

Google will be designating Vincent Mo as its 30(b)(6) designee with respect to Topic 1 subparts (ii), (iii), (iv), (v), (vi) and (vii) as those topics relate to the accused casting functionality in YouTube, YouTube Music, YouTube Kids and YouTube TV.

Lindsay

From: Dan Smith <smith@ls3ip.com>
Sent: Monday, April 11, 2022 7:39 PM
To: Lindsay Cooper <lindsaycooper@quinnemanuel.com>; Marc Kaplan <marckaplan@quinnemanuel.com>; Jae Pak <pak@ls3ip.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Re: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

[EXTERNAL EMAIL from smith@ls3ip.com]

Lindsay,

We can accept the following dates next week assuming Google provides us with the source code printouts requested in Geoffrey Moss's April 8, 2022 email in advance of the depositions.

- Vincent Mo – April 19
- Umesh Patil – April 20
- David Nicholson – April 21

Regards,
Dan

From: Lindsay Cooper <lindsaycooper@quinnemanuel.com>
Date: Wednesday, April 6, 2022 at 11:12 PM
To: Marc Kaplan <marckaplan@quinnemanuel.com>, Dan Smith <smith@ls3ip.com>, Jae Pak <pak@ls3ip.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>, QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

Dan,

Following up on the below, Mr. Nicholson is also available for deposition on April 21, and Mr. Mackay is also available for deposition on April 26.

Please let us know if we can confirm these dates.

Lindsay

From: Marc Kaplan <marckaplan@quinnemanuel.com>
Sent: Monday, April 4, 2022 9:29 PM
To: Dan Smith <smith@ls3ip.com>; Lindsay Cooper <lindsaycooper@quinnemanuel.com>; Jae Pak <pak@ls3ip.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Re: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

Dan,

We will work on new proposed dates for Mr. Mackay and Mr. Nicholson.

Regarding the source code printout request, Google is willing to produce the requested source code but does not waive its objections to further printout requests beyond the limits of the protective order. As we discussed, the printing format that the parties utilized in the ITC was different than we expected, and therefore Geoff and Chris should print the code to PDF that they have requested in the agreed format (60 lines/page), and after confirmation that there are no issues with the PDF'd code printouts, we will produce it to you. If Geoff and Chris need to visit the source code machine in less than a week (the notice typically required), we are willing to waive that requirement in this instance given the circumstances.

Thank you,
Marc

From: Dan Smith <smith@ls3ip.com>
Date: Monday, April 4, 2022 at 2:24 PM
To: Marc Kaplan <marckaplan@quinnemanuel.com>, Lindsay Cooper <lindsaycooper@quinnemanuel.com>, Jae Pak <pak@ls3ip.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>, QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Re: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

[EXTERNAL EMAIL from smith@ls3ip.com]

Marc,

Given that the opening summary judgment briefs are due on April 14th, these new proposed dates for Mr. Mackay will not work. Additionally, during the parties meet and confer last Friday, Google confirmed that it will soon be supplementing its response to Sonos's Interrogatory No. 12 regarding Google's noninfringement positions. As such, please provide alternative dates for Mr. Mackay that will allow Sonos sufficient time to review Google's supplemental noninfringement positions prior to the deposition.

Further, given Google's representation that it will be supplementing its noninfringement positions, as well as the parties' ongoing dispute regarding Sonos's request for source code printouts, we are going to have to reschedule Mr. Nicholson's deposition (and potentially other scheduled witnesses) to allow Google time to supplement its noninfringement positions and to allow the parties sufficient time to resolve the dispute regarding the source code printouts, which Sonos plans to use during the deposition. Regarding the latter, Sonos is waiting for Google's response to the points Sonos raised during the parties meet and confer last Friday.

Regards,
Dan

From: Marc Kaplan <marckaplan@quinnemanuel.com>
Date: Monday, April 4, 2022 at 12:12 PM
To: Lindsay Cooper <lindsaycooper@quinnemanuel.com>, Jae Pak <pak@ls3ip.com>, Dan Smith <smith@ls3ip.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>, QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Re: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

Jae,

Following up on Lindsay's email below, we will need to schedule Mr. Mackay's deposition for when he returns from vacation on April 14 or 15th.

Please let us know which of these dates is preferable for Sonos.

Thank you,
Marc

From: Lindsay Cooper <lindsaycooper@quinnemanuel.com>
Date: Sunday, April 3, 2022 at 6:14 PM
To: Jae Pak <pak@ls3ip.com>, Dan Smith <smith@ls3ip.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>, QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

Jae,

Due to a scheduling error, Mr. Mackay is no longer available for deposition on April 6. Given Sonos's request to take Google's 30(b)(6) designee on Topic 1 subpart (i) before opening showdown briefs are due, we're investigating whether he can be available for deposition on April 5. We will follow up as soon as we can confirm. Mr. Mackay will be on vacation April 6-12, so if April 5 doesn't work we can also investigate dates when he's back.

Assuming Mr. Mackay's deposition can proceed this week, his email address is kmackay@google.com. Marc Kaplan will be attending for Google.

Mr. Nicholson's email address is davidjn@google.com. Nima Hefazi will be attending for Google.

Can you confirm that the deposition vendor you're using to book these depositions is planning to use Google Meet?

Lindsay

From: Jae Pak <pak@ls3ip.com>
Sent: Friday, April 1, 2022 11:18 AM
To: Dan Smith <smith@ls3ip.com>; Lindsay Cooper <lindsaycooper@quinnemanuel.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Re: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

[EXTERNAL EMAIL from pak@ls3ip.com]

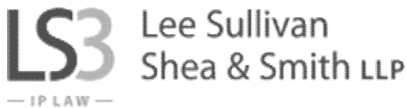
Lindsay,

Could you please provide (1) the email addresses of Mr. Mackay and the attorney on your side that will be attending his deposition on the 6th, and (2) the email addresses of Mr. Nicholson and the attorney on your side that will be attending his deposition on the 7th? We'll need to provide those email addresses to Veritext.

Best,
Jae

Jae Pak

Lee Sullivan Shea & Smith LLP
656 W. Randolph St., Floor 5W, Chicago, IL 60661
312.754.9232 *Direct*
pak@ls3ip.com | www.ls3ip.com



From: Dan Smith <smith@ls3ip.com>
Date: Thursday, March 31, 2022 at 8:56 AM
To: Lindsay Cooper <lindsaycooper@quinnemanuel.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>, QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Re: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

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Lindsay,

We confirm that Sonos will proceed with deposing Mr. Mackay in both his personal capacity and as Google's designee on April 6.

We also confirm that Sonos will proceed with deposing Mr. Nicholson on April 7.

We are still looking into the proposed dates for the other witnesses.

Thanks,
Dan

From: Lindsay Cooper <lindsaycooper@quinnemanuel.com>
Date: Tuesday, March 29, 2022 at 11:14 PM
To: Dan Smith <smith@ls3ip.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>, QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

Dan,

We disagree with your position on the foreign witnesses but will respond separately on that issue.

To follow up on my email below, we are designating Ken Mackay on Topic 1 subpart (i) as it relates to speaker functionality. He is available for deposition on April 6.

Lindsay

From: Dan Smith <smith@ls3ip.com>

Sent: Tuesday, March 29, 2022 7:50 PM

To: Lindsay Cooper <lindsaycooper@quinnemanuel.com>

Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>

Subject: Re: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

[EXTERNAL EMAIL from smith@ls3ip.com]

Lindsay,

We will get back to you on the proposed dates.

Regarding Google's foreign witnesses, as Google is a plaintiff in this case that specifically selected the NDCA for its jurisdiction of choice for the claims at issue, Google should provide its foreign witnesses either somewhere in the US or in a foreign country where the added burdens of the Hague Convention do not apply.

Dan

On Mar 29, 2022, at 1:03 AM, Lindsay Cooper <lindsaycooper@quinnemanuel.com> wrote:

Dan,

We can offer the following dates for the Google witnesses Sonos has requested:

- David Nicholson – April 7
- Kelly Keniston – April 12
- Vincent Mo – April 19
- Umesh Patil – April 20
- Ali Mills – April 26
- Janos Levai – April 27

In addition, we are still working to try and make our 30(b)(6) designee on Topic 1 subpart (i) available for deposition next week as Sonos requested. We will follow up with more information on that soon, likely tomorrow.

As we noted in our objections and responses to Sonos's 30(b)(6) notice, we will be making our witnesses available for deposition remotely via Google Meet.

Please note that Mr. Levai is based in Switzerland. Although Sonos has not yet requested her deposition, Ramona Bobohalma is based there as well. Based on our current understanding of the law, deposing a witness remotely in Switzerland requires both submitting a Hague Request to the U.S. district court and obtaining approval from the Swiss Federal Judicial authority. To the extent Sonos plans to depose Ms. Bobohalma as well, we suggest Sonos complete this process for both witnesses at the same time.

We are still working on dates for the remaining witnesses and will follow up.

Lindsay

From: Dan Smith <smith@ls3ip.com>
Sent: Monday, March 28, 2022 4:35 PM
To: Lindsay Cooper <lindsaycooper@quinnemanuel.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Re: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

[EXTERNAL EMAIL from smith@ls3ip.com]

Lindsay,

Just following up on my email below. Any update on when the 30(b)(6) and individual witnesses will be available for deposition?

Thanks,
Dan

From: Dan Smith <smith@ls3ip.com>
Date: Tuesday, March 15, 2022 at 5:34 PM
To: Lindsay Cooper <lindsaycooper@quinnemanuel.com>
Cc: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>, QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Google v. Sonos, Case No. 3:20-cv-06754-WHA - Depositions

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Lindsay,

Pursuant to Local Rule 30-1 and Judge Alsup's Standing Order, we'd like to begin scheduling depositions for late March and April. In particular, in view of the upcoming summary judgment schedule for the patent showdown, please provide (1) dates in late March or the first week of April for Google's 30(b)(6) witness(es) for Topic No. 1, subpart (i); and (2) dates in late April for Google's 30(b)(6) witness(es) for Topic No. 1, subparts (ii)-(vii).

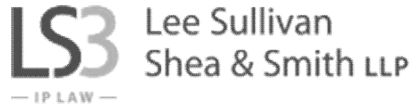
Also, unless otherwise noted, please provide dates in late March or April for the following individual witnesses. For any witnesses who are ESI custodians, please provide dates that will allow Google time to complete its ESI production at least seven days in advance of the deposition.

- Ken Mackay (please provide dates in late March or the first week of April)
- Ali Mills
- David Nicholson
- Umesh Patil
- Tavis Maclellan
- Kelly Keniston
- Vincent Mo
- Janos Levai
- Debajit Ghosh
- Oriol Prieto-Gasco

Additionally, please let us know if you represent Mario Quieroz.

Thanks,
Dan

J. Dan Smith



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